



Eric Gonzalez
District Attorney

**DISTRICT ATTORNEY
KINGS COUNTY**

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[INSERT NAME]
Assistant District Attorney

[INSERT DATE]

[INSERT D/C INFO]

Re: [INSERT CASE NAME]
Kings County Dkt./Ind. No. [#####]

In connection with the above-named case, the People voluntarily provide the following information regarding:

MOS NAME: JOSEPH FLYNN

MOS TAX: [REDACTED]

in satisfaction (to the extent applicable) of their constitutional, statutory, and ethical obligations. Further, the People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use and/or introduction into evidence.

Disclosure # 1:

MOS FLYNN IS A NAMED DEFENDANT IN THE FOLLOWING CIVIL ACTION HYTHAM ABOUSHI V. CITY OF NEW YORK, ET AL, 3685/2011, FILED IN KINGS SUPREME.

BASED UPON CCRB DOCUMENTS UP TO DATE THROUGH OCTOBER 13, 2020, THE PEOPLE ARE AWARE OF THE FOLLOWING CCRB SUBSTANTIATED AND/OR PENDING ALLEGATIONS AGAINST THIS OFFICER:

Disclosure # 2:

CCRB CASE: 200505590

REPORT DATE: 05/22/2005

INCIDENT DATE: 05/22/2005

CCRB SUBSTANTIATED ALLEGATION(S):

1. ABUSE - SEARCH (OF PERSON)

NYPD DISPOSITION: INSTRUCTIONS

Eric Gonzalez
District Attorney
Kings County